

Supporting Statement
Pipeline Safety: Periodic Underwater Inspections

1. Explain the circumstances that make the collection of information necessary. Include identification of any legal or administrative requirements that necessitate collection.

Two pipeline incidents occurred in the late 1980's in the Gulf of Mexico when on two occasions, fishing vessels struck offshore gas pipelines. These incidents resulted in the deaths of 13 fishermen. The National Transportation Safety Board (NTSB) investigation of these incidents cited among the causes the pipeline operators failure to maintain the pipeline at its initial burial depth. Further, NTSB cited RSPA's failure to require pipeline operators to inspect and maintain submerged pipelines in a protected condition. NTSB recommended that RSPA develop and implement requirements to ensure that pipeline operators inspect and maintain submerged pipelines in areas subject to damage by surface vessels.

A joint task force of Federal Agencies was formed to study offshore pipeline issues. The conclusions were similar to those of the NTSB. However, they concluded the problems of underwater buried pipeline were not confined to the Gulf of Mexico.

Further, the Congress required the Department of Transportation to establish a mandatory, systematic and where appropriate, periodic pipeline inspection and reburial program for all shallow water submerged pipelines in the Gulf of Mexico. In 1992 Congress further expanded the requirement to include all offshore pipelines, underwater abandoned pipeline facilities, and all facilities which cross under, over, or through navigable waters, if the location could pose a hazard to navigation (Pub. L. 102-508 (49 U.S.C. 1692(h) (3)).

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Federal and state pipeline safety inspectors will use this information to ensure compliance with the rule requiring periodic inspection of buried underwater pipeline where appropriate.

3. Describe whether, and to what extent the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decisions for adopting this means of collection. Also describe any consideration of using information technology to reduce the burden.

Operators are free to use any means to comply with the requirements.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for purposed describe in item 2 above.

No similar information exists.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Few small companies operate underwater pipelines.

6. Describe the consequence to Federal Program of policy activities if the collection were conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

The frequency of the collection is determined by the operator and the risk of the pipeline becoming exposed.

7. Explain any circumstances that require the collection to be conducted in a manner:

requiring respondents to report information to the agency more than quarterly;

requiring respondents to prepare a written response to a collection in fewer than 30 days after receipt of it;

requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances as described above.

8. If applicable provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be reported.

A Federal Register notice seeking comments we be published along with this supporting statement.

9. Explain any decision to provide any payment or gift to respondent, respondents other than remuneration of contractors or grantee.

No payment is provided.

10. Describe any assurance of confidentiality provided and the basis for the assurance in statute, regulation, or agency policy.

No confidentiality is provided.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature.

12. Provide estimates of the burden of the collection of information.

125 pipeline operators are potentially subject to this requirement. It will take each operator approximately 1/4 person-year 500 hours to develop a plan for periodic inspection. $125 \times 500 = 62,500$ hours for the industry to comply with this requirement.

The cost to develop this plan should be \$100 per hour for a total cost of development of \$6.25 million ($62,500 \times \$100 = \6.25 million).

13. Provide an estimate of the annual cost to respondents or record keepers resulting from the collection of information.

Approximately 10% of the 125 companies or 13 companies may need to inspect their pipelines annually. The cost of this annual inspection is \$15,000 per company. The annual cost of this periodic inspection is \$195,000 annually ($\$15,000 \times 13 = \$195,000$).

14. Provide estimates of annualized cost to the Federal Government.

The cost to the Federal Government should be approximately \$50,000 per year.

15. Explain reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new collection.

16. For the collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication.

There is no statistics uses and no plans for publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

RSPA is not seeking such approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions", of OMB form 83-1.

There is no exception.